Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

BACKGROUND DOCUMENT

ON PROPOSED AMENDMENTS TO

310 CMR 7.30

Massport/Logan Airport Parking Freeze

3/24/17

REGULATORY AUTHORITY:
M.G.L. c. 111, §§142A – 142O

I. Summary

The Massachusetts Department of Environmental Protection (MassDEP) proposes to amend 310 CMR 7.30 *Massport/Logan Airport Parking Freeze*, at the request of the Massachusetts Port Authority (MassPort), to allow an additional 5,000 commercial parking spaces at Boston Logan International Airport, and to require evaluation of ways to reduce the number of vehicle trips to and from the airport. On June 6, 2016, MassPort submitted to MassDEP a request for the regulatory amendment and a technical analysis showing that increasing the number of parking spaces would improve air quality by reducing a growing trend of drop off/pick up vehicle trips occurring due to inadequate parking availability. When compared to a single drive and park trip to the airport, drop-off/pick up vehicle trips can result in up to twice as many vehicle miles traveled (VMT), along with associated increased air emissions.

II. Background

Massport owns and operates Logan International Airport, which is subject to a cap or "freeze" on the number of commercial parking spaces. The U.S. Environmental Protection Agency (EPA) established the Logan Parking Freeze in 1975 to reduce vehicle emissions to help meet the carbon monoxide and ozone National Ambient Air Quality Standards (NAAQS), for which Massachusetts had been in nonattainment. MassDEP adopted the parking freeze into regulation when it promulgated 310 CMR 7.30 *Massport/Logan Airport Parking Freeze* in 1989, and updated the regulation in 2001. Massachusetts met the carbon monoxide standards in 1987 and has monitored compliance since that time. Massachusetts met the ozone standards in 2015.

Massport submitted its most recent Logan Airport Parking Space Inventory to MassDEP on April 15, 2016. The report listed the following allocation of spaces:

Existing Total Commercial Parking Spaces	18,640
Existing Total Employee Parking Spaces	2,448
Existing Total Parking Freeze Spaces	**21,088**

In addition to the parking freeze, Massport has taken several actions to increase transit and high occupancy vehicle (HOV) access to the airport. These include establishing additional Logan Express sites and significantly expanding service, and providing financial support to the MBTA for expanding Silver Line bus access to Logan Airport. These actions have resulted in an increase of the total capacity of HOV/shared-ride mode service by 154% since 1989.

As contemplated by 310 CMR 7.30, Massport also acquired Park-and-Fly lots in East Boston, permanently removing these spaces from East Boston and transferring them to the Airport, and permanently shifted a large number of employee spaces to commercial use. Since 2000, Massport has spent $76.7 million in capital costs to purchase the Park-and-Fly properties and transfer 1,681 parking spaces. In addition, Massport re-purposed one site to build the Bremen Street Park in 2005. Since 2008, Massport has supported this property with over $14.6 million in maintenance and security for the Bremen Street Park. Massport currently spends $32.8 million annually on HOV operations and amortized capital expenditures of over $158.9 million since 2002.

Despite these efforts to reduce VMT, an analysis by Massport indicates that, with increasing air passenger growth at Logan Airport, the current commercial parking cap has the unintended effect of negatively affecting air quality. The analysis indicates that the constrained parking supply causes 75% of passengers who would otherwise choose to park at Logan to instead use a private pick up/drop off mode. This behavior results in up to four trips to the Airport rather than two, thereby increasing airport-related vehicle trips associated air emissions in the metropolitan Boston area. The analysis shows that adding 5,000 spaces to the parking freeze limit would result in a substantial decrease in vehicle trips and emissions and provide a significant air quality benefit.

On June 6, 2016, Massport requested that MassDEP amend 310 CMR 7.30 to increase the commercial parking freeze limit by 5,000 spaces. This increase would allow for the allocation of spaces as follows:

Proposed New Total Commercial Parking Spaces	23,640
Proposed New Total Employee Parking Spaces	2,448
Proposed New Total Parking Freeze Spaces	**26,088**

In keeping with the structure of the 1989 regulations, Massport has proposed that the amendments require Massport to undertake three long-term studies in support of alternative means of transit, including study of (1) ways to improve HOV access to Logan; (2) strategies for reducing pick-up/drop-off modes; and (3) parking pricing strategies. The amendments also would require Massport to commit to Logan Express service from the North Shore and continue to identify and implement additional suitable Logan Express sites and services.

Any new parking garage built as a consequence of the proposed amendments would be subject to review under the Massachusetts Environmental Policy Act (MEPA) and Massport would commit, through MEPA Section 61 Findings, to additional mitigation measures with respect to the garage's environmental impacts.

Attachment 1 contains Massport's request and supporting documents, including the Massport Policy Memorandum that provides an overview of the history of the Logan parking freeze and a description of measures Massport has implemented to increase HOV and public transit access to the airport, and the Massport Technical Analysis of the impacts of increasing the parking cap.

1. Massport's Policy Memorandum

In the Massport Policy Memorandum, Massport details how parking is becoming more constrained at Logan airport, leading to lower customer service levels and operational challenges and costs. The constrained parking encourages more people to choose drop-off/pick-up travel modes, which increases VMT and air emissions. This problem is exacerbated by continued growth in air passenger travel. Since 1975, there has been a 220% increase in passengers at Logan, but only an 80% increase in Logan's commercial parking supply. Projected increases in air passenger activity at Logan will make the problem worse over time. In addition, the number of long-term parkers (>4 hours) is increasing while the number of short-term parkers is decreasing, which results in fewer parking spaces per parker.

The Massport Policy Memorandum also summarizes the Massport Technical Analysis (see section "III. Air Quality Impacts" beginning on page 15). Massport summarizes the overall technical approach as follows:

- The Massport Technical Analysis combined the 2014 parking demand data with the estimated growth assumptions for air travelers/parkers. It calculates the number of days in which parking demand would exceed the effective commercial parking cap at Logan, and the total number of vehicles that would not be accommodated with available parking. (Exhibit 18) The number of vehicles was then translated into number of air passengers, who were in turn distributed to the regional areas of origin based on the distribution of parkers. The survey data determined which modes these passengers would use if they were not able to park at the airport. Next, the analysis calculated the VMT of the would-be parkers' alternative trips, taking into consideration the number of trips required by the mode, the average distance from the origin area, and the vehicle occupancy rate. (p. 18)

- Based on this VMT data, the Massport Technical Analysis then identified the air quality benefits that additional commercial parking at Logan would produce. The analysis used a vehicle emissions simulation model to determine emissions factors for application to the VMT values. The analysis considered two scenarios: one where Massport builds 5,000 additional commercial spaces by 2022; a second where Massport builds 2,500 spaces by 2020 and an additional 2,500 spaces by 2022. Under both scenarios, the reduced VMTs would result in significant emissions reductions. For example, under scenario 1, the addition of 5,000 spaces in 2022 would produce a 26% reduction in the emission of CO2, VOCs and NOx. The air quality benefits to be realized are significant under both scenarios. (p. 20)

2. Massport's Technical Analysis

The Massport Technical Analysis was prepared by Vanasse Hangen Brustlin (VHB) and dated December 11, 2015. Several highlights taken from the Massport Technical Analysis are:

- The number of weeks where parking demand exceed the effective commercial parking freeze limit has been increasing over the last several years. In general, there is an overall growth in the number of weeks with high daily demand, particularly in the last 5 years. (p. 38)

- The Logan Parking Freeze Regulation expressly allows a limited number of "Restricted Use" spaces, exceeding the cap number up to 10 days per year. In 2014, Massport invoked the use of restricted-use spaces four times. In the first half of 2015, Massport has already used restricted use spaces eight times – evidence that parking demand at Logan continues to grow, despite Massport's increased HOV service offerings. Furthermore, in 2014, Massport diverted cars to Suffolk Downs twice, and in 2015, six times. Diverting cars from the airport to Suffolk Downs adds VMT. (p. 39)

- While Logan experiences constrained parking conditions during weeks of peak activity annually, recent observations show that the level of constraint is increasing and for longer periods, requiring Logan to adjust its parking operations to meet this increased demand. (p. 39)

- Parking cars beyond the supply of lined spaces occurs in four ways: (1) vehicles are "stuffed and stacked", utilizing the unlined areas in the parking garages and lots that can fit a vehicle without impact to circulation, (2) overflow lots, which currently are available in the Southwest Service Area of the airport, (3) paved areas on airport that are not parking lots (e.g., under roadway viaducts), and (4) off-airport at Suffolk Downs, outside of the East Boston Parking Freeze area. (p.40)

- In 2014, Massport diverted or valet-parked passenger vehicles 103 out of 260 working days. Vehicle diversions primarily occurred on Tuesdays and Wednesdays, during hours of peak parking demand. Activity in 2014 demonstrates that peak day parking demand has not dampened despite the July 2014 parking rate increases for on-airport parking. These diversions and valet operations present operational and customer service challenges to the Airport and increase on-Airport vehicle miles traveled. (p. 40)

- Recent trends and air passenger forecasts indicate that peak-day parking demand will continue to grow at Logan Airport. Annual air passenger levels at Logan Airport were over 31.6 million (as of 2014), and the levels have increased by over 200 percent in the past 40 years. Air passenger levels are projected to reach approximately 36 million by 2022. (p. 43)

- Parking demand on a typical busy weekday is anticipated to reach approximately 22,900, 26,400, and 30,100 spaces by 2025 using the low, moderate, and high growth rates, respectively. (p. 44)

- An increase in the Logan Airport parking freeze cap of 5,000 spaces will provide the capacity to support projected future parking demand on a typical busy day (peak-days). For example, if parking demand on a typical busy day grows at the low growth rate, the relief in the freeze cap will enable Logan Airport to provide sufficient parking to accommodate approximately 10 years of peak-day parking demand. However, if growth trends continue as they have in recent years (as demonstrated by the moderate and high growth rates), the requested relief in the cap of 5,000 spaces will provide enough potential capacity on airport to support less than 5 years of peak-day parking demand growth. (p. 44)

- In general, three-quarters of would-be parkers would choose vehicle curbside drop-off modes such as drop-off by private vehicle and taxi and black car limo services. These modes typically have a higher number of trips associated with them. Drop-off/pick-up modes generate up to twice as many vehicle trips as parking one's vehicle on-airport. (p. 53)

- If daily parking demand were to increase by 30 percent (which could occur sometime in 2030–2035 if increased at the forecast air passenger growth rate), the annual net VMT increase [by would-be parkers] would be over 10 million additional vehicle miles." (p. 54)

- The analysis shows that building additional parking will result in a decrease of vehicle emissions of all would-be parkers. The VMT analysis shows that building more parking spaces enables would-be parkers to use their preferred ground access mode, parking. Parkers result in less VMT than their drop-off/pick-up counterparts, as parking on-airport results in fewer trips than drop-off/pick-up modes per air-passenger. This result is demonstrated in the air quality analysis, as emissions of CO2, VOC, and NOx are substantially reduced (on the order of 20-25 percent) when comparing build conditions (with additional parking on-airport) to no build conditions (without additional parking on-airport) of the same year. (p. 58)

The Massport Technical Analysis concludes:

> Despite Massport's industry-leading efforts to dampen ground-access vehicle trips and vehicle miles traveled through a capped parking supply and implementing HOV/shared ride mode initiatives, vehicle trips continue to increase with growth in air travel. As air passenger numbers increase, the lack of available parking at Logan Airport has resulted in an increase in "drop-off/pick-up" vehicle trips – thereby increasing VMT / trips and contributing to emissions – the exact effect the original regulation was intended to offset.
>
> Amending the Parking Freeze cap at Logan (i.e., allowing more air passengers to park on-airport) would decrease the number of overall vehicle trips, decrease overall ground access VMT, and result in a net decrease in pollutant emissions (by approximately 20-25 percent) compared to conditions where the parking supply at Logan Airport is kept constant at its current levels.
>
> An additional 5,000 parking spaces on-airport enables Logan Airport to reduce some current vehicle pick-up/ drop-off activity (and the associated VMT and air emissions), while ensuring future pick-up/drop-off activity is not increased due to a lack of available parking spaces. Approximately 2,000 spaces of the proposed 5,000-spaces are expected to ease pick-up/drop-off activity by providing spaces for current demand levels (2015 as shown on the chart above). The additional 3,000 spaces should provide adequate parking to the year 2022 in order to prevent a parker returning to a vehicle pick-up/drop-off mode due to lack of parking spaces." (p. 62-63)

III. Stakeholder Involvement

To solicit feedback on Massport's request, MassDEP convened a stakeholder group and held two meetings on September 22 and November 29, 2016. At the September meeting Massport presented its proposal to add 5,000 parking spaces and the air quality benefits expected from

reducing drop off/pick up trips to and from Logan Airport.[1] At the second meeting Massport explained in more detail its methodology for evaluating vehicle miles traveled and how expected emission reductions were calculated.[2] MassDEP received feedback at the meetings and received several written comments. In general, environmental advocates and representatives of residents who live near the airport raised concerns that increasing parking would increase traffic, congestion and vehicle emissions, rather than reduce them. Business interests voiced support for increasing the parking cap to reduce emission and ensure ease of transport in and out of Boston, given the role the airport plays in economic growth in Massachusetts and the region.

IV. Description of the Proposed Amendments

The following is a description of MassDEP's proposed amendments to 310 CMR 7:30:

1. 310 CMR 7.30(1) *Applicability* – Update the description of the geographic boundaries of the Logan Parking Freeze area, which have changed since the regulations were last amended in 1990.

2. 310 CMR 7.30(2) *Terms of the Parking Freeze* – Amend the parking space caps to:

    a) Increase the maximum total number of commercial and employee spaces within the Logan Airport Parking Freeze to 26,088 (from 19,315). Note that the current parking cap is 21,088, rather than 19,315 (as stated in the current regulation) because over time Massport has added park and fly spaces to the Logan Freeze Area as allowed by 310 CMR 7.30(5). These additions did not result in an overall net increase in Logan Parking spaces but rather moved the location of the parking spaces away from residential areas to the airport, which was a desired outcome. Therefore, the proposed amendment would add 5,000 total parking spaces to the current cap (21,088 + 5,000 = 26,088);
    b) Reduce the total number of employee parking spaces to 2,448 (from 5,225), reflecting the conversion of employee spaces to commercial spaces that has occurred since 2000 as allowed by 310 CMR 7.30(4).
    c) Increase the minimum number of commercial spaces to 23,640 (from 14,090). Note that the current commercial parking cap is 18,640, rather than 14,090 (as stated in the current regulation) due to the conversion of employee spaces and the acquisition of Park and Fly spaces that has occurred over time. The addition of 5,000 new commercial spaces will increase the commercial cap from 18,640 to 23,640 spaces.

    Note: In the event that the remaining 702 Park-and-Fly spaces in the East Boston Freeze cap are converted to commercial spaces at Logan Airport in the future as allowed by 310 CMR 7.30(5), the total number of commercial spaces allowed would increase to 24,342, and the total cap (commercial and employees spaces) would increase to 26,790. See the Summary of Parking Freeze History below:

[1] Massport's presentation is available at http://www.mass.gov/eea/docs/dep/air/community/dep-stakeholder-final-9-22.pdf

[2] Massport's presentation is available at http://www.mass.gov/eea/docs/dep/air/community/dep-stakeholder-final-11-29.pdf

Summary of Parking Freeze History

Parking Spaces	**1975 Federal rules**	**1989 MassDEP rules**	**2000 MassDEP's current rules**	**Actual 2016 spaces[3]**	**Proposed 2017 cap**
Commercial	10,215[4]	Not to exceed 19,315	14,090	18,640	23,640
Employee	n/a[5]	Not to exceed 7,100[6]	5,225[7]	2,448	2,448
Total	10,215	19,315	19,315[8]	21,088[9]	26,088

3. 310 CMR 7.30(3) *Parking Space Inventory* – amend to require Massport to submit its 6-month parking inventory by March 1st and September 1st of each year, and make other minor changes.

4. 310 CMR 7.30(4) *Employee Parking Reduction* – amend to reflect the fact that Massport has completed implementing its plan for converting employee parking spaces to commercial spaces.

5. 310 CMR 7.30(6) *Rental Motor Vehicle Parking* – delete this section since Massport completed the relocation of rental car spaces from the East Boston Freeze area onto Logan Airport with the completion of the Consolidated Rental Car Facility in 2013.

[3] These actual inventory numbers are higher than the regulatory numbers in 310 CMR 7.30, because the rule allows transfer of additional spaces from Park-and Fly lots and through the reduction of employee parking spaces. These numbers were reported by Massport it its Parking Inventory dated April 15, 2016.

[4] Massport's Technical Analysis, p.9.

[5] The 1975 Logan Parking Freeze capped the number of commercial spaces controlled by the Massachusetts Port Authority at 10,215. The 1975 parking freeze regulations were published at 40 CFR Section 52.1135. (Massport Policy Memo p. 8)

[6] The 1989 Parking Freeze regulations expanded the categories of regulated parking beyond commercial spaces to include employee parking spaces (7,100 at the time) and allowed for 2,000 overflow spaces. All three categories were covered by a single cap of 19,315 spaces. (Massport Policy Memo p. 9-10)

[7] This number was reduced to reflect reductions in employee spaces that had been converted to commercial spaces. (Massport Policy Memo p.10)

[8] This cap was allowed to increase under the 2001 rule by the number of spaces acquired through transfer of "Park-and-Fly" spaces from East Boston brought onto the airport property. The maximum number of spaces that could be transferred from East Boston in 2001 was 2,475, bringing the potential commercial space cap to 21,790 spaces. (Massport Policy Memo p.10)

[9] Note that permitted transfers of additional spaces have increased the cap on commercial spaces as well as the total number of spaces through the addition of 1,773 spaces from Park-and- Fly lots since 2001, as well as the reduction of a total of 4,652 employee spaces since 1994. (Massport Policy Memo p.12)

6. 310 CMR 7.30(8) *Transportation Management Studies and Programs* – delete two prior transportation studies that were required under the 1989 Amendment and were completed, and replace with a requirement to submit the following three new studies within 24 months of the date of adoption of the regulatory amendment:
   a) A study of the feasibility and effectiveness of potential measures to improve high occupancy vehicle access to Logan Airport. The study will consider, among other things, possible improvements to Logan Express bus service and the benefit of adding additional Silver Line buses with service to Logan Airport.
   b) A study assessing different parking pricing strategies to affect customer behavior and VMT.
   c) A study of the feasibility and effectiveness of potential operational measures to reduce pick-up / drop-off modes of access to Logan Airport.

   Specify that Massport should maintain and improve its Logan Express bus service in all areas around Boston, rather than just in the western and South Shore locations specified in the 1989 Amendment.

7. 310 CMR 7.30(9) *Recordkeeping and Reporting* – amend to allow Massport to satisfy its annual reporting requirements through its submission of annual Environmental Data Reports or similar airport-wide documents required under the Massachusetts Environmental Policy Act (MEPA), M.G.L. ch. 30, ss. 61 – 62H.

V. State Implementation Plan Revision

MassDEP is required to submit its final Logan Parking Freeze regulatory amendments to EPA as a revision to the State Implementation Plan (SIP). In order for EPA to approve the regulatory amendments, the amendments must meet Clean Air Act (CAA) Section 110(ℓ), which prohibits EPA approval of a SIP revision that interferes with attainment of the NAAQS or other CAA applicable requirements. MassDEP believes that the proposed amendments to increase the cap on commercial parking spaces meets the requirements of Section 110(ℓ) because the amendments will result in reduced emissions as demonstrated in the Massport Technical Analysis (see Section VII. Analysis of Vehicle Emissions Resulting from VMT Changes beginning on page 56).

MassDEP believes that the proposed amendments address a situation that is similar to the situation addressed by the 1989 Parking Freeze amendments that increased the parking cap. In approving the 1989 regulations, EPA stated that "The existing parking freeze has had the unanticipated effect of vastly increasing passenger drop off and pick up, resulting in twice as many vehicle trips as would occur if each passenger drove to the airport. The increase of 2,000 commercial spaces at the airport, coupled with the program for exchanging employee spaces for commercial spaces and with continuing improvements in alternate means of access to the airport, should lessen the drop-off/pick-up phenomenon."

VI. Impacts of Proposed Amendments

1. Economic Impacts

The proposed amendments are not expected to have significant economic impacts; however, they may provide some positive economic effect regarding Logan Airport operations since they would provide more flexibility to Massport as the operator of the Airport. According to Massport's 2014 EDR, in 2014 Logan Airport was the 18th busiest U.S. commercial airport in North America as ranked by aircraft operations, and the 19th busiest in North America ranked by number of passengers. In the international sector, in 2014 Logan Airport ranked as the 7th largest U.S. international transatlantic gateway, and 12th largest international gateway globally. In 2014, approximately 12,000 people were employed at Logan Airport. This included approximately 960 Massport airport staff and administration employees. Including airport-related activities, Logan Airport contributes $13.4 billion annually to the local economy. The Massachusetts Department of Transportation (MassDOT) Aeronautics Division's Statewide Airport Economic Impact Study found that in 2014, Logan Airport supported approximately 132,000 jobs. The total economic impact includes on-Airport, visitor-related, construction, and all associated multiplier impacts.

2. Impacts on Cities and Towns

Pursuant to Executive Order 145, state agencies must assess the fiscal impact of new regulations on the Commonwealth's municipalities. The proposed amendments do not impose additional requirements on municipalities and are intended to reduce vehicle miles travelled in the Boston metropolitan area related to Logan Airport. Therefore, MassDEP believes that the proposed amendments will not have a significant adverse impact on municipalities.

3. Agricultural Impacts

Pursuant to M.G.L. C. 30A, §18, state agencies must evaluate the impact of proposed programs on agricultural resources within the Commonwealth. MassDEP believes that the proposed amendments will not have significant impacts to agriculture.

VII. Source Reduction

The implementation of source reduction is a MassDEP priority, and is defined as practices that reduce or eliminate the total mass of contaminants discharged into the environment. The proposed amendments support source reduction by seeking to reduce vehicle miles travelled and associated emissions.

VIII. Massachusetts Environmental Policy Act (MEPA)

The proposed amendments are exempt from the "Regulations Governing the Preparation of Environmental Impact Reports," 301 CMR 11.00, in that no MEPA review threshold set forth in 310 CMR 11.03 is met or exceeded. In addition, the proposed amendments do not reduce standards for environmental protection, nor do they reduce opportunities for public participation

in review processes or public access to information generated or provided in accordance with the regulations. (See MEPA review threshold pertaining to promulgation of regulations at 301 CMR 11.03(12).) The Massport Technical Analysis submitted in support of the proposed amendments demonstrates that increasing the commercial parking cap at Logan Airport by 5,000 spaces will act to slow the growth in VMT, resulting in less vehicle emissions than if the regulation were not to be amended.

Final amendments to 310 CMR 7.30 that increase the parking freeze cap will not establish an entitlement for the development of new or expanded parking facilities at Logan Airport. Under the MEPA Regulations, the construction of 300 or more new parking spaces requires the submission and review of an Environmental Notification Form (ENF), and the construction of 1,000 or more new parking spaces requires the submission and review of an Environmental Impact Report (EIR). (See MEPA review thresholds at 301 CMR 11.03(6)(a.7) and 11.03(6)(b.15). Therefore, prior to constructing a new parking facility, Massport will submit an EIR under MEPA and the commit to enforceable mitigation commitments relating to any new parking facility will be incorporated into a Section 61 Finding. (See 301 CMR 11.12(5).)

Separate from the review of individual projects at Logan Airport, Massport reports and analyzes the cumulative environmental impacts of its operations and activities at Logan Airport to the MEPA Office on an annual basis. Since 1979, Massport has submitted annual Environmental Data Reports (EDR) and has submitted a more detailed Environmental Status and Planning Report (ESPR) every five years. The EDR / ESPR process provides a public forum for reporting on airport-wide data and trends, and supplies the context for the more focused MEPA review of individual projects. For this reason, the proposed amendments to 310 CMR 7.30(9) *Recordkeeping and Reporting* would allow Massport to incorporate its annual reporting under the Parking Freeze into its annual EDR and ESPR (every five years) submissions.

IV. Public Hearings and Comment

M.G.L. Chapter 30A requires MassDEP to give notice and provide the opportunity to review the proposed amendments and background and technical information. Since the final amendments will be submitted to EPA as part of the Massachusetts SIP, formal notice will be issued 30 days before the public hearing pursuant to federal notice requirements in CAA 42 U.S.C. § 7410(a) and 40 CFR §51.102(d). The hearing will be held in accordance with the procedures of M.G.L. Chapter 30A. The hearing notice and proposed amendments are available on MassDEP's website at: www.mass.gov/eea/agencies/massdep/news/comment/. For further information, please contact Glenn Keith at 617-292-5874 or Glenn.Keith@state.ma.us.